

Second RFPs, Extreme has been clear (as was noted in its Objections served in response to the Second RFPs) that it has no intention of providing meaningful, substantive responses until this Court has ruled on Defendants' Motion to Stay Discovery.

5. Extreme's response to the Second RFPs does not meet the spirit or the requirements of discovery provided by Rules 26, 34, and 37 of the Federal Rules of Civil Procedure and applicable case law.

6. Extreme's conduct disregards its obligations to conduct discovery as provided by the Federal Rules of Civil Procedure.

7. Plaintiffs are prejudiced in the prosecution of their claims by Extreme's conduct and refusals.

8. In support of this Motion, Plaintiff submits the accompanying Memorandum of Law and Declaration of John L. Wood.

WHEREFORE, for the reasons set forth above, and as are set forth in Plaintiff's Memorandum of Law in support of its Motion to Compel Responses to Plaintiff's Second Set of Requests for Production of Documents, and upon the grounds as shall be raised at oral argument of this Motion (if any), Plaintiff asks this Court to enter an order compelling Defendant Extreme to respond to each of Plaintiff's Second Set of Requests for Production of Documents without further delay and hold that all of Extreme's objections to Plaintiff's discovery requests are deemed waived (or at the very least find that Defendants' general objections are waived). Plaintiff also asks this Court to grant it any additional and further relief to which the Court determines Plaintiff is entitled under applicable authority.

Respectfully submitted,

Dated: May 19, 2021

By: /s/ Cheryl G. Rice

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Dated: May 19, 2021

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